

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW HAMPSHIRE**

**CAROLINE CASEY and MAGGIE
FLAHERTY**

Plaintiffs,

v.

**WILLIAM GARDNER, in his official
capacity as New Hampshire Secretary of
State, and
GORDON MACDONALD, in his official
capacity as New Hampshire Attorney
General**

Defendants.

**NEW HAMPSHIRE DEMOCRATIC
PARTY, By Raymond Buckley, Chair**

Plaintiff,

v.

**WILLIAM GARDNER, in his official
capacity as New Hampshire Secretary of
State, and
GORDON MACDONALD, in his official
capacity as New Hampshire Attorney
General**

Defendants.

Consolidated Case No.: 1:19-cv-00149-JL

JOINT UPDATED DISCOVERY PLAN

Pursuant to the Court's request of December 27, 2020, the Parties have conferred and hereby submit this joint updated discovery plan.

Scheduling Designation	Current Deadline	Proposed Deadline
Production of Documents in Response to Plaintiffs' First Set of Requests for Production of Documents (propounded August 6, 2019)	12/13/2019	2/7/2020
Completion of Paper Discovery	12/31/2019	3/2/2020
Completion of Discovery	12/31/2019	4/1/2020
Disclosure of Experts and Written Reports	Completed	Completed
Challenges to Expert Testimony	Thirty days before Trial	4/1/2020
Disclosure of Claims Against Unnamed Parties	Completed	Completed
Joinder of Additional Parties	Completed	Completed
Third Party Actions	Completed	Completed
Amendment to Pleadings	Completed	Completed
Motions to Dismiss	Completed	Completed
Trial	Week of 1/6/2020	Week of 5/4/2020

All parties reserve the right to seek an immediate status conference with the Court after the New Hampshire Supreme Court issues an order on the certified questions in this case to seek relief from the schedule for any reason. All parties also reserve the right to seek a status conference with the Court as needed to resolve areas of disagreement between the parties.

Respectfully submitted,

CAROLINE CASEY AND MAGGIE FLAHERTY,

By and through their attorneys affiliated with the American Civil Liberties Union of New Hampshire

Foundation and the American Civil Liberties Union
Foundation,

Dated: January 6, 2019

/s/ Henry R. Klementowicz

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Henry R. Klementowicz (N.H. Bar No. 21177)
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Respectfully submitted,

NEW HAMPSHIRE DEMOCRATIC PARTY,
By Raymond Buckley, its chair

By its attorney,

Dated: January 6, 2019

/s/ Henry R. Klementowicz for

William E. Christie
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Respectfully submitted,

WILLIAM M. GARDNER, Secretary of
State of the State of New Hampshire,
in his official capacity, et al.,

By their attorney,

Gordon J. MacDonald
Attorney General

Dated: January 6, 2019

/s/ Anthony J. Galdieri

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CERTIFICATE OF SERVICE

The undersigned certifies that he has electronically has served this pleading on all counsel of record through the court's ECF system.

Dated: January 6, 2019

/s/ Henry R. Klementowicz
Henry R. Klementowicz